Message

From: Pirrello, Michael (NFK) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MICHAEL.PIRRELLO]

Sent: 3/28/2011 7:06:15 PM

To: Khan, Annie (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MassMail-01/cn=Recipients/cn=Annie.Khan]

Subject: RE: Cw. v.

Hi Annie,

I just faxed over a copy of defense counsel's motion for discovery on this case. It was allowed with the exception of #6 and #9.

Let me know if you need anything else.

~Michael

----Original Message----From: Khan, Annie (DPH)

Sent: Thursday, March 24, 2011 8:09 PM

To: Pirrello, Michae<u>l (NFK)</u>

Subject: RE: Cw. v.

Hi Michael,

I will send the standard discovery packet for this case by next week.

Out of curiosity, is there a Motion from d/c in regards to the chemical reagents, protocols, QC records etc? If so, could you please either fax or email me a copy for my records.

I maintain and supervise the QC/QA program for all the instruments, balances, reagents/standards, and making sure that all the chemists are following the policies of the Lab.

We generally do not provide these documents per the Lab Supervisor. Let me see what I can do to help.

I'll keep you posted.

Annie Drug Analysis Lab 617-983-6631 (work) 617-983-6625 (fax)

From: Pirrello, Michael (NFK)

Sent: Thursday, March 24, 2011 4:31 PM

To: Khan, Annie (DPH)

Subject: Cw. v.

Hi Annie,

I'm the ADA assigned to the above case. The incident at hand involved substances that had to be tested. You were the chemist who had tested the substances. The Lab # is

The court has ordered that we provide the following information. The case is next scheduled for Compliance on May 25th. Please forward the following info to me before that date:

- 1.) CV of all chemists who tested substances
- 2.) Notice as to whether any police reports prepared concerning this case were made available to the lab personnel involved in the testing of substances
- 3.) All lab notes on this case
- 4.) lot #s of all chemicals, re-agents, and standards used in drug analysis
- 5.) Notice as to make/models of all lab instruments and balances used
- 6.) Analytical data from testing and analyses used
- 7.) protocols in place relative to testing and analyses performed
- 8.) Records of quality control for all, including records of testing, calibration, cleaning, and repairs
- 9.) List of all accreditations of the drug lab

Thanks for your help,

Michael